

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2003-327-C

IN RE:

Continued Availability of Unbundled)	ITC^DELTACOM
High Capacity Loops at Certain Locations and)	COMMUNICATIONS, INC.'S
Unbundled High Capacity Transport on Certain)	OBJECTIONS TO BELL SOUTH'S
Routes Pursuant to the Federal Communication)	FIRST REQUEST FOR
Commission's Triennial Review Order)	PRODUCTION OF DOCUMENTS
<hr/>		(1-5)

Pursuant to S.C. Code Ann. Regs. 103-854, S.C. Rule of Civil Procedure 34, and the Joint Motion for Initial Procedural Order approved by the South Carolina Public Service Commission on December 11, 2003, ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom") hereby submits its specific objections to BellSouth Telecommunications, Inc.'s ("BellSouth's") First Requests for Production of Documents, served on December 8, 2003.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce any maps and/or diagrams that illustrate the most current information available for the physical location of your high capacity transport and/or loop facilities within the Southeastern states.

RESPONSE:

ITC^DeltaCom objects to this request for production on the grounds that it seeks confidential, proprietary business information the disclosure of which could be damaging to ITC^DeltaCom's business.

2. Produce any documents identified in response to BellSouth's First Set of Interrogatories in this docket.

RESPONSE:

All documents identified in response to BellSouth's individual interrogatories are marked as such and appended to the interrogatories subject to the corresponding interrogatory objections; the actual production of confidential information will be made pursuant to the terms of the forthcoming Protective Order approved by the South Carolina Public Service Commission or to a protective agreement between the parties.

3. Produce any business case from 2000 to present in your possession, custody, or control that evaluates, discusses, analyzes or otherwise refers or relates to your actual or planned deployment of high capacity transport and/or loop facilities within the Southeastern states.

RESPONSE:

ITC^DeltaCom objects to this request for production on the grounds that it is overbroad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. To the extent that this request for production requests specific financial, business or proprietary information regarding ITC^DeltaCom's economic business model, ITC^DeltaCom objects to providing or producing any such information on the grounds that those requests presume that the market entry analysis is contingent upon ITC^DeltaCom's economic business model instead of the hypothetical business model contemplated by the TRO. The TRO explicitly contemplates that in considering whether a competing carrier economically can compete in a given market without access to a particular unbundled network element, the Commission must consider the likely revenues and costs associated with the given market based on the *most efficient business model* for entry rather than to a *particular carrier's business model*. TRO at ¶ 326.

4. Produce any business case from 2000 to present in your possession, custody, or control that evaluates, discusses, analyzes or otherwise refers or relates to your obtaining high capacity transport and/or loop facilities from other persons.

RESPONSE:

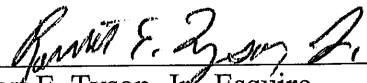
ITC^DeltaCom objects to this request for production on the grounds stated in the objection to request for production 3 above.

5. Produce all documents from 2000 to present referring or relating to how you determine whether or not to deploy high capacity transport and/or loop facilities.

RESPONSE:

ITC^DeltaCom objects to this request for production on the grounds stated in the objection to request for production 3 above.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

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December 18, 2003

CERTIFICATE OF SERVICE

I, the undersigned of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for ITC^DeltaCom Communications, Inc., do hereby certify that I have a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

Pleadings: **ITC^DeltaCom Communications, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Requests for Production (1-5)**

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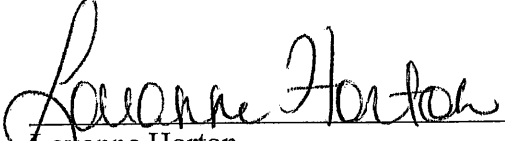
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